

SAMUEL BERNARD JOHNSON, III
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Plaintiff - *In Pro Se*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SAMUEL BERNARD JOHNSON III,
Plaintiff,

vs.

CHEVRON CORPORATION, a Delaware
corporation, CHEVRON CORPORATION
LONG-TERM DISABILITY PLAN
ORGANIZATION, a Delaware corporation,
CHEVRON ENVIRONMENTAL
MANAGEMENT COMPANY, a California
corporation, CATHERINE DREW,
KATHRYN M. GALLACHER, ROBERT
SCHMITT, HARALD SMEDAL, SUSAN
J. SOLGER, SELLERS STOUGH,
KRYSTAL TRAN, DEBBIE WONG,
GARY A. YAMASHITA, and DOES 1-5,

Defendants

Case No.: C 07-05756 SI (JCS)

**PLAINTIFF'S OBJECTIONS AND NOTICE
OF INTENT TO MOVE TO QUASH THE
SUBPEONA ISSUED TO "KAISER
PERMANENTE HOSPITAL –
PSYCHOLOGICAL RECORDS"**

**TO DEFENDANTS CHEVRON CORPORATION, CHEVRON
ENVIRONMENTAL MANAGEMENT COMPANY, THEIR ATTORNEY OF RECORD,
FIRST REPROGRAPHICS AND KAISER PERMANENTE HOSPITAL –
PSYCHOLOGICAL RECORDS:**

PLEASE TAKE NOTICE that Samuel Bernard Johnson III (hereinafter referred to as “Plaintiff Johnson”) **HEREBY OBJECTS TO**, and intends to **MOVE TO QUASH** in its entirety, the subpoena issued by First Reprographics, Chevron Corporation, Chevron Environmental Management Company and their attorney of record Filice Brown Eassa & McLeod LLP to Kaiser Permanente Hospital Psychological Records located at 27400 Hesperian Boulevard, Hayward, California seeking the production of certain medical records (requested on Attachment To Subpoena In A Civil Case) pertaining to Plaintiff Johnson on August 29, 2008.

Plaintiff Johnson asserts that the subpoena is improper and no records (requested on Attachment To Subpoena In A Civil Case) should be produced to First Reprographics, Chevron Corporation, Chevron Environmental Management Company and their attorney of record Filice Brown Eassa & McLeod LLP on the following grounds, until the objections and/or motion to the Court is resolved:

- Failure of Chevron Corporation, Chevron Environmental Management Company and their attorney of record Filice Brown Eassa & McLeod LLP to properly serve Plaintiff Johnson with notice of the subpoena prior to its issuance by First Reprographics to Kaiser Permanente Hospital Psychological;
- Failure of First Reprographics, Chevron Corporation, Chevron Environmental Management Company and their attorney of record Filice Brown Eassa & McLeod LLP to provide timely notice to Plaintiff Johnson of the issuance of the subpoena prior to its issuance; and
- The subpoena records goes outside the scope of this litigation.

/s/

Dated this 25th day August of 2008

SAMUEL BERNARD JOHNSON III